

## The Honorable John C. Coughenour

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

**KELLY USANOVIC**, individually, and on behalf of all others similarly situated,

*Plaintiff,*

V.

**EXP REALTY, LLC**, a Washington limited liability company,

*Defendant.*

Case No. 2:23-cv-00687-JCC

**UNOPPOSED MOTION AND  
[PROPOSED] ORDER REGARDING  
DEADLINE FOR DEFENDANT EXP  
REALTY, LLC TO ANSWER OR  
OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**

**NOTE ON MOTION CALENDAR:  
June 29, 2023**

## I. MOTION

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and LCR 7(d)(1), Defendant eXp Realty, LLC (“eXp Realty”), by its counsel, moves this Court for a fourteen (14) day extension of time, up to and including July 19, 2023, in which to file an answer or otherwise respond to Plaintiff’s Class Action Complaint (“Complaint”). Plaintiff agrees to the requested extension. As grounds therefor, eXp Realty states as follows:

1. Plaintiff filed her Complaint on May 10, 2023. eXp Realty was served with the Complaint on May 17, 2023.

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2. On June 6, 2023, the Court granted eXp Realty's first unopposed motion for extension of time to respond to the Complaint, up to and including July 5, 2023.

3. eXp Realty's response to the Complaint is currently due to be filed on or before July 5, 2023.

4. Undersigned counsel requires additional time to review the case materials, conduct its ongoing fact investigation into the allegations in the Complaint, and continue analyzing its defenses to Plaintiff's claims in order to file the appropriate response to Plaintiff's Complaint.

5. Therefore, eXp Realty requests a fourteen (14) day extension of time, up to and including July 19, 2023.

6. Plaintiff's counsel has agreed to this extension.

7. This Motion for extension of time is made in good faith and not for purposes of delaying the ultimate resolution of this case.

WHEREFORE, eXp Realty respectfully requests a fourteen (14) day extension of time, up to and including July 19, 2023 to file and serve its response to the Complaint, and that the Court provide such other relief as it deems just and proper.

Dated: June 29, 2023

**SAVITT BRUCE & WILLEY LLP**

By: /s/ Duncan E. Manville  
Stephen C. Willey, WSBA No. 24499  
Duncan E. Manville, WSBA No. 30304  
1425 Fourth Avenue, Suite 800  
Seattle, Washington 98101-2272  
Telephone: 206.749.0500  
Facsimile: 206.749.0600  
Email: [swilley@sbwllp.com](mailto:swilley@sbwllp.com)  
Email: [dmanville@sbwllp.com](mailto:dmanville@sbwllp.com)

UNOPPOSED MOTION AND ORDER  
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**SAVITT BRUCE & WILLEY LLP**  
1425 Fourth Avenue Suite 800  
Seattle, Washington 98101-2272  
(206) 749-0500

1  
2                   **McGUIREWOODS LLP**  
3

4                   s/ Sarah A Zielinski  
5

6                   Sarah A. Zielinski (*pro hac vice* on file)  
7                   Amy Starinieri Gilbert (*pro hac vice* on file)  
8                   McGuireWoods, LLP  
9                   77 West Wacker Drive, Suite 4100  
10                  Chicago, Illinois 60601-1818  
11                  Tel: 312.849.8288  
12                  [szielinski@mcguirewoods.com](mailto:szielinski@mcguirewoods.com)  
13                  [agilbert@mcguirewoods.com](mailto:agilbert@mcguirewoods.com)  
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15                  *Counsel for Defendant eXp Realty, LLC*  
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## II. ORDER

Defendant eXp Realty, LLC has moved to extend the deadline (currently set for July 5, 2023) to serve its answer or otherwise respond to Plaintiff's Complaint. The Court is advised that Plaintiff's counsel has agreed to this extension. The Court accepts Defendant's unopposed motion.

**IT IS HEREBY ORDERED** that Defendant eXp Realty, LLC's deadline to serve its answer or otherwise respond to the Complaint is extended by 14 days to July 19, 2023.

DATED this 3rd day of June, 2023.

Joh C Cypher

The Honorable John C. Coughenour  
United States District Judge

1                   **CERTIFICATE OF SERVICE**

2                   I hereby declare under penalty of perjury under the laws of the United States of America  
3 that on this date, the foregoing document was filed electronically with the Court and thus served  
4 simultaneously upon all counsel of record.

5                   I declare under penalty of perjury that the foregoing is true and correct.

6                   EXECUTED on June 29, 2023.

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